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4 p. iv. CASE NO. 55431-3-II
5 COURT OF APPEALS DIVISION II

6 KENNETH TAYLOR CURRY
7 Plaintiff Appellant,
8

9
10 v.

11 VANCOUVER HOUSING AUTHORITY

12 et. Al.

13 Defendants.
14

CERTIFICATE OF COMPLIANCE

15 As required by the Washington Supreme Court
16 RAP 18.7, Plaintiff certify that his Opening
17 Brief regarding the above captioned cause, contains
18 21 pages, excluding the parts of such document
19 that are exempted by rule. Plaintiff is prosecuting
20 his appeal in propria persona on a standard type
21 writer that is limited to a maximum 12 point
22 pica or Regency Number 80 type face.
23

24 Kenneth Taylor Curry declares that the foregoing
25 statement is true. RCW 9A.72.085
PLAINTIFF'S OPENING BRIEF

L.C. No. 19-2-03380-06
(360) 944-7056

10-17-21
Kenneth Curry
Kenneth Taylor Curry
1208 N.E. 143rd Ave #3
Vancouver, WA. 98684

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CASE No. 55431-3-II

4

5 COURT OF APPEALS DIVISION II

6

7 KENNETH TAYLOR CURRY

8 Plaintiff Appellant,

9

10 v.

11 VANCOUVER HOUSING AUTHORITY and
12 ROY JOHNSON in his Official and
his Private Capacity, Joint and
Several,

13 Defendants Appellees.

14

15 OPENING BRIEF FOR PLAINTIFF

16

17 Kenneth Taylor Curry appearing
in propria persona.

18

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INTRODUCTION

On the day of 9-16-2014 — Plaintiff observed
1 his Supplemental Security Income evidence of
2 disability and his reasonable accommodations
3 request being placed into the mail file of the
4 ADA/504 published coordinator, David Overbay.
5 Overbay is also the Policy Manager for Dfendants.
6 It became the third or fourth time that Overbay
7 responded that he did not received a request
8 from Plaintiff.

9 When Plaintiff discovered that Specialist
10 I, Inessa A. Raybukin had possession of the said
11 request, Plaintiff prepared his question. The
12 Raybukin response to why is she intercepting
13 request to Overbay is that she does not believe
14 that any person will approve the requests.

15 On or about 9-19-2014 Plaintiff notified
16 Raybukin that Plaintiff considers withholding
17 reasonable accommodations as disability discrimina-
18 tion. And further that Plaintiff is willing
19 to prefer a law suite, has already marshaled
20 her service address and corrobbrated the information
21 per responsible cognate at such address. Raybukin
22 complained to police that Plaintiff never threatened
23 bodily harm but that she was concerned that Plaintiff
24 said that he said he knows where she lives.

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p. -5. a. ASSIGNMENTS OF ERROR

I. Defendants error when they assume that the

1 Washington State Local Agency, a Public Housing
2 Authority, has been promulgated subject matter
3 jurisdiction to determine in a first instance who
4 is a violence threat against persons or the property
5 of another.

6 IA Defendants failure to provide a predeter-
7 mination hearing is a due process Plain Error that
8 result a void judgment.

9 IB Plaintiff's rescinded participation in
10 the Housing Choice Voucher program is constitutional
11 error, ultra virus and void ab initio.

12 II Defendants recoupment of cost/fees is statutory
13 error that offend the supremacy clause. 42 U.S.C.
14 § 1437f(o)(2)(3): mandate 30% adjusted income as
15 the rent contribution.

16 III VHA Administrative Rule 3-III.C is a vague
17 and overbreath color of state law error that chills
18 pure speech.

19 IV Plaintiff is denied Equal Protection under
20 the law as subsidized housing participants receive
21 judicial intervention before their property interest
22 may be rescinded while Plaintiff is denied even
23 concomitant administrative predetermination hearing
24 relief.

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p. -4. ISSUES PERTAINING TO ASSIGNMENTS OF ERROR

Whether the Superior Court reversibly error by
1 refusing to hear the issue of original subject
2 matter jurisdiction to determine who in the first
3 instance is a criminal violence threat respecting
4 Public Housing Authority Administrative Hearings
5 concerning Housing Choice Voucher participants?

Whether regardless of a Superior Court hearing
6 the Public Housing Authority original subject
7 matter question, it is ripe at any time for the
8 Court of Appeals to determine that the said Defen-
9 dants are without authority to determine that
10 a Housing Choice Voucher participant is a criminal
11 violence threat offender in a first instance?

Whether the Defendants failure to hold a
13 predetermination administrative hearing renders
14 its order that rescind Plaintiff's Housing Choice
15 Voucher void ab initio?

Whether Public Housing Authority law provide
17 authority for such local state agencies to determine
18 in a first instance who is a violence threat
19 criminal offender?

Whether cost or fees to the Defendants increase
21 the cost of rental housing above the 30% statutory
22 adjusted income mandate contribution?

Whether VHA Administrative Plan 3-III.C is
24

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p. -3.

a constitutional defective act owing to vagueness
or overbreath that chill pure speech?

Whether Defendants have original subject
matter jurisdiction to determine that a Housing
Choice Voucher participant is a criminal violence
threat to persons or to the property of another?

Whether Plaintiff is denied Equal Protection
under the law in that public housing participants
will loose their program property interest only
in the wake of judicial intervention, yet Plaintiff
may be rescinded from his program property interest
in want of judicial predetermination or even want of
an administrative predetermination hearing?

Whether 42 U.S. Code § 1437f(ö)(2)(3) actually
means 30% adjusted income within the meaning
of Housing Choice Vouchers respecting U.S. Constitution
Article VI, Paragraph 2? Supremacy Clause.

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b. STATEMENT OF THE CASE

1 Plaintiff was a participant in a Housing and Urban
2 Development Section 8 Certificate program for about 15
3 years. Defendants administered the said H.U.D. program
4 and the same is not remarkable. Nonetheless Plaintiff
5 separated from the Section 8 Certificate before many
6 years later is enrolled into the H.U.D. Housing Choice
7 Voucher program that was also administered by the
8 Defendants. On or about September 25, 2014 — Defendants
9 delivered to Plaintiff a written notice that Plaintiff's
10 Housing Choice Voucher is rescinded "effective immedi
11 ately."

12 The Housing Choice Voucher is a needs based program
13 property interest that demands a Goldberg predetermination
14 hearing. Due process requires a competent hearings
15 officer and inter alia, access to common law objections.
16 Plaintiff has not received either. As a fact, Plaintiff
17 is not presented any predetermination hearing.

18 Plaintiff is singled out by the Executive Order
19 albeit every other person is assessed and from the
20 housing director up.

21 Defendants do not cite any authority for publishing
22 to other public housing agencies that Plaintiff is
23 a criminal threat. The administrative record must
24 include subject matter jurisdiction.

25 plaintiff's opening brief
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2 c. ARGUMENT

3 Violent criminal activity means any criminal activity that
4 has as one of its elements the use, attempted use, or threatened
5 use of physical force substantial enough to cause, or be reasona-
6 bly likely to cause, serious bodily injury or property damage.

7 24 CFR § 5.100

8 VHA Administrative Plan, Section 3-III.C is comparable
9 to 24 CFR § 982.552 C (2) (ix). The VHA said rule and the
10 HUD said regulation severally incorporate criminal offenses
11 that include an element defining violence as set forth in the
12 foregoing 24 CFR § 5.100 regulation.

13 The elements clause of VHA Administrative Plan, Section
14 3-III.C, notwithstanding, Defendants did not publish or include
15 with in the Notice to Rescind the Housing Choice Voucher any
16 offense allegation. There is no written notice of any criminal
17 law violation for this Plaintiff to have disputed at a December
18 4, 2014 administrative hearing. Want of due process notice.

19 The residual clause is barren of any standards. "or other
20 language, . . . customarily used to intimidate may be considered
21 abusive or violent behavior." Every categorical approach does
22 require a named offense. What are an offense elements? VHA
23 Administrative Plan, Section 3-III.C is not a criminal proscrip-
24 tion. What is the ordinary case of "or other language . . ."

25

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3 What does customarily used to intimidate mean? Is it a nation
4 standard, a State of Washington standard, a Clark County standard
5 or the personal standard of VHA staff or employees. Is there
6 ever a serious potential risk of true threats, in the ordinary
7 case that presents no elements for definition or even a category.

8 In that the United States Department of Housing and Urban
9 Development limits an inquiry to criminal offense, questions
10 of negligence are out. There must be conscious of guilt, a
11 guilty mind or mens rea. How could a participant ever know
12 of expectations or risk? How could law enforcements police,
13 judges or juries assess conduct? With out any named offense?
14 Local law enforcement determined that there is not any offense!

15 To qualify as a true threat, a communication must be a
16 serious expression of an intention to commit unlawful physical
17 violence, not merely "political hyperbole;" "vehement, caustic,
18 and sometime unpleasantly sharp attacks;" or "vituperative,
19 abusive, and inexact" statements. Watts v. United States,
20 394 US 705, 708 (1969) (per curium) HUD however has determined
21 that any threat must be a substantial injury, property damage
22 of another or abuse.

23 The ordinary case for customary languish for violence or
24 abuse to inform substantial violence or abuse language to intimi-
25 date seems to be more than due process allows.

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DEFENDANTS LACK ORIGINAL
SUBJECT MATTER JURISDICTION
PLAIN ERROR

FACTS

On the day of September 25, 2014 — Defendants issued a written notice to deny Plaintiff's participation in the Housing Choice Voucher program. " This denial is effective immediately. " The reason alleged for such decision is violation of Vancouver Housing Authority policy: [VHA Administrative Plan, Section 3-III.C.] Housing and Urban Development define violence for Public Housing Agencies. 24 CFR § 5.100

The circumstance of Defendants' said notice has not resulted a presentment, an indictment, an information or even a charge of criminal conduct.

A. WANT OF PREDETERMINATION
HEARING PLAIN ERROR VOID
JUDGEMENT

1. Needs based subsidy housing is a matter of statutory entitlement and procedural due process is applicable. 42 USC § 1437f (a); 24 CFR § 982., authorized Annual Contributions Contract, and Goldberg v. Kelly, 397 U.S. 254, 261 — 263 (1970) Plaintiff's interest in un interrupted housing clearly out weigh Defendants' interest in threat speculations. P.p. 397 U.S. 264 — 266. There is no actus Reus or mens rea.

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p2 A predetermination hearing is necessary to provide
Plaintiff procedural due process. P.p. 397 U.S. 264,
1 397 U.S. 266 — 271.

2 2. The predetermination hearing notice must be
3 timely and adequate detailing the reasons for ter-
4 mination, with an effective opportunity to defend
5 by confronting adverse witnesses and by presenting
6 Plaintiff's own arguments and evidence orally before
7 the decision maker. P.p. 397 U.S. 266 — 270.
8 P. 397 U.S. 255.

9 3. What are the elements of a particular common
10 law, statute or ordinance proscribed crime? What
11 basic fact, intermediate fact or ultimate fact are
12 relied on by the decision maker? P. 397 U.S. 271.
13 Consult: Ressler v. Pierce, 692 F. 2d. 1212, 1216
14 (9th. Cir. 1982) Affirming due process protection
15 in housing.

16 4. A void judgement Order under federal law is
17 one in which the rendering court lacked subject
18 matter jurisdiction over the dispute or over the
19 parties or otherwise acted unconstitutional in en-
20 tering judgement, U.S.C.A. Constitution Amendment 5.
21 Hays v. Louisiana Dock Co., 452 N.E. 2d. 1383 (III
22 App. 5 Dist. 1983). The Judgement or Order are
23 void for violating our federal constitution. (Long
24 v. Shore Bank Development Corp., 182 F. 3d. 548

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1 (C.A. 7. Ill. 1999)

2 5. Respecting the present cause, rather than set a
3 future date whether thirty days for a proposed ter-
4 mination of the Housing Choice Voucher participation,
5 Defendants effected an immediate rescinded voucher.
6 A Predetermination hearing did not intervene. Even
7 as Plaintiff's property interest is protected under
8 United States Constitution, Amendment XIV: Procedural
9 Due Process. Cf. Washington Constitution, Article I,
10 Section 3.

11 6. Plaintiff must be allowed to realize his pre-
12 determination hearing as requested. Post-determina-
13 tion hearings shift the Burden of Proof. Rather
14 than Defendants meeting their burden of production,
15 a substantial evidence standard, Plaintiff's presump-
16 tion of correctness is denied. Plaintiff must then
17 convince the Administrative Hearings Officer to
18 reinstate program participation. A much more dif-
19 ficult challenge than defending against a notice
20 of future threat to rescind program participation.
21 Washington Protection may be beyond federal rights.
22 *Murdoch v. Memphis*, 87 US (20 Wall) 590, 22 LEd 429
23 (1875): Washington is final arbiter of state law.
24 See: *Hallsmith v. City of Montpelier*, No. 2014-346

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1 [2015 VT 83 (Dec. Term 2014) ¶ 20 Ln. 5 @ p. 7]
2 The administrative burden is shifted to the former
3 employee as a review that burden employee with the
4 production and the persuasion.

5 B. RESCINDED PARTICIPATION IN
6 HCV ORDER IS VOID AB INITIO
ERROR ULTRA VIRES

7 1. Chapter 35.82 RCW is the Housing Authority Law
8 or Public Housing Agency Enabling Act. It does
9 not promulgate an Original Subject Matter Jurisdic-
10 tion for determining who is a criminal threat of
11 violence on a person or the property of another.
12 Authority to determine who is threatening criminal
13 violence in the first instance is in the province
14 of Superior Court, Courts of Limited Jurisdiction
15 and the Justice of the Peace. Beside the United
16 States District Court of Article 3., U.S. Const.
17 and the statutory U.S. Magistrate. Federalism.
18 2. Ab initio void orders may be circumvented by
19 collateral attack or remedied by mandamas. Sanchez
20 v. Hester, 911 S.W. 2d. 173 (Tex. App., Corpus
21 Christi 1995) Where there is an absence of juris-
22 diction, all administrative proceedings are a nul-
23 lity and confer no right, offer no protection and
24 afford no justification, and may be rejected upon

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1 direct attack. Thompson v. Tolmie, 2 Pet. 157,
2 7 L. Ed. 381; Griffith v. Frazier, 8 CR 9, 3 L.
3 Ed. 471; No sanction can be imposed absent of proof
4 of jurisdiction. Standard v. Olsen, 74 S. Ct. 768;
5 Title 5 USC, Sec. 556 and 558 (b); The proponent
6 of the rule has the burden of proof. Title 5 USC
7 Sec. 556 (d). Jurisdiction can be challenged at
8 any time, even on final determination. Basso v.
9 Utah Power and Light Co., 495 F. 2d. 906, 910 (1972)
10 Once the Local State Agency has been challenged,
11 its jurisdiction must be proven. Hagans v. Lavine,
12 415 U.S. 533 (1974). When jurisdiction challenges
13 the act of a Local State Agency as being illegal,
14 Defendants can not simply avoid liability based
15 on the fact of being an official. United States
16 v. Lee, 106 U.S. 196, 220, 221((1882), 1 S. Ct.
17 240, 261.

18 II. RECOUPMENT OF COST/FEEES
19 SUBSTANTIVE DUE PROCESS
20 ERROR

21 1. Where the Administrative Hearings Record Proper
22 does not recite original subject matter jurisdiction,
23 it is remote from frivolous. Courts are not in
24 the business of chilling redress of grievances.
25 Moreover where there is no administrative jurisdic-

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1 tion, there can be no cost/fee recovery. Every
2 needs based transfer payment recipient must have
3 access to a course for redress of denied predeter-
4 mination grievances. Superior Court ordering cost
5 or fees to Defendants is Plain Error.

6 2. Defendants are required to follow a statutory
7 and a regulatory scheme imposed by congress and
8 by Housing and Urban Development respectively.
9 The H.U.D. enabling act is 42 USC § 3535, it author-
10 izes rule making and regulations at Title 24 CFR;
11 28 CFR Part 982. et. seq. Housing Choice Voucher
12 participants per 42 USC § 1437f a 30% adjusted income
13 rent payment. Any judicial assignment of cost or
14 fees for pursuing a needs based property interest
15 predetermination hearing, does elevate the family
16 rent obligation beyond the federal 30% limit. Viewed
17 as reversible error. Owing to Defendants exceeded
18 its charter, inter alia. RCW 35.82.070 Power of
19 Authority. 42 U.S. Code § 1437a(a) Rental Payments.

20 III. VAGUE AND OVERBREADTH
21 ADMINISTRATIVE PLAN
22 3-III.C IS CONSTITUTIONAL
23 DEFECTIVE AND ERROR

24 1. Vancouver Housing Authority Administrative Plan
25 3 III.C is unconstitutional on its face. Reasonable
persons debate its meaning as to which conduct is
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1 proscribed. The residual clause is barren of any
2 meaningful definition and violence laws are not
3 enumerated.

4 2. In that 24 CFR §5.100 defines violent threats
5 against persons or the property of another, Plaintiff
6 argues that the said Local State Agency rule must
7 incorporate criminal laws. Meaning that notice
8 of any alleged violation must cite such law and
9 minimally recite its positive elements. Thus an
10 accused will be on notice of what s/he is called
11 upon to defend.

12 3. Defendants seem to construe 3 III.C as proscrib-
13 ing remaining at places open to the general public,
14 utilizing side walks as an original place of public
15 debate, by parole notice of intent to sue, marshal-
16 ing the statutory residence that acquire jurisdiction
17 over the parties or identifying responsible persons
18 at the same residence. Defendants also pretend
19 that identifying witnesses to a manufactured allegation
20 tion who benefit compulsory process equate violence
21 threats on persons or on the property of another.
22 Defendants conclude from whole cloth an imagined
23 result. Even the police report that finds no violence
24 evidence is nonetheless Defendants' proof of crime.

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1 State v. Dawley, 11 Wash App 2d 527 (Div. 1., 12-
2 30-2020) RCW § 4.28.080(16)(17) Wa Const Art I §§ 4,5
3 4. The Local State Agency Rule Construction must
4 be viewed through the lens of strict construction.
5 The police report recites that Defendants allege
6 that a Black Male has threatened violence against
7 a White Female National. There is no evidence of
8 a violence threat on persons or on the property
9 of another. The Complaining Witness is an obvious
10 person of color whether a U.S. National. Nonetheless
11 regardless of any facial defect, a law that allows
12 race reporting is overbroad. Or unconstitutional
13 as applied in the manner of chilling protected con-
14 duct. Pure Speech. U.S. Const. Amend. I. Wa. Const.
15 Art. I, §§ 1, 5. Defendants expand beyond the enumer-
16 ated basis for termination. Race or color are not
17 listed. Gain v. Alleghany Housing Authority, 986
18 A 2d 947, 951 (Pa. Commw. Ct. 2009) Defendants
19 have not alleged **Serious bodily injury or property**
20 **damage** albeit the same is a material element in
21 the Housing and Urban Development definition of
22 what constitutes criminal violence threats against
23 persons or the property of another. 24 C.F.R. §
24 5.100 The record lacks violence evidence or proof.

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1 5. The issue of vagueness or over breath error is
2 informed by consulting Johnson v. United States,
3 576 US 591 (2015). The Armed Career Criminal Act
4 18 USC § 924(e)(1) residual clause is ruled unconsti-
5 tutional for vagueness that deny due process. The Court
6 at its next term determined that Johnson is a sub-
7 stantive rule change that require retroactive appli-
8 cation. Welch v. United States, 578 US (2016).
9 Then the Court extended its concept to civil deporta-
10 tion matters by applying Johnson to 18 USC § 16(b)
11 residual clause. Ruling that 18 USC § 16(b) is uncons-
12 titutional for vagueness that deny due process.

13 6. Whether the instant case depict circumstances
14 as dire as prison or deportation, when children of
15 poverty, disability populations or the aging participant
16 are removed from needs based programs, it is a penalty
17 that incur much suffering. Vancouver Housing Authori-
18 ty Administrative Plan, 3-III.C has a residual clause
19 as vague as 18 USC § 16(b).

20 7. Plaintiff is not questioning the constitutionality
21 of any Housing and Urban Development regulation.
22 H.U.D. regulations apply to U.S. Territories, District
23 of Columbia and sister states that may have authorized
24 their Public Housing Agencies to in a first instance
determine criminal status.

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The Vancouver Housing Authority policy [VHA Administrative Plan, Section 3-III.C] states that:

The VHA will deny assistance to an applicant family if:

A family member has engaged in or threatened violent or abusive behavior toward VHA personnel.

Abusive or violent behavior towards VHA personnel includes verbal as well as physical abuse or violence. Use of racial epithets, or other language, written or oral, that is customarily used to intimidate may be considered abusive or violent behavior.

Threatening refers to oral or written threats or physical gestures that communicate intent to abuse or commit violence.

Sessions v. Dimaya, 584 U.S. ; 138 S Ct 1204; 200 L Ed 2d 549 (2018) LEXIS 2497. Cf. State of Washington v Joshua K. Ellis, No. 53691-9-II that inform implicit bias. An accusation instrument must not express race bias. Dimaya does bring Johnson to the civil forum. That is the DOJ Administrative Hearings procedure for emigration courts.

PLAINTIFF'S OPENING BRIEF

L.C. No. 19-2-03380-06
(360) 944-7056

Kenneth Taylor Curry
1208 N.E. 143rd Ave #3
Vancouver, WA. 98684

IV. ADMINISTRATIVE HEARING ERROR
DENY EQUAL PROTECTION OF LAW

1
2 1. The authority to assign original subject matter
3 jurisdiction is vested at Washington Constitution
4 Article II, Section 1, respecting legislation and
5 initiatives. There is no power granted for congress
6 to commandeer Local State Agencies. United States
7 Constitution, Amendment X, rights reserved to the
8 States.
9 2. H.U.D. did not acquire commandeering authority
10 from congress or exercise such by advising Public
11 Housing Agencies that they may find criminal culpa-
12 bility or liability where there has been no conviction.
13 Consider 24 CFR § 966.4(I)(5)(iii)(A) concerning
14 Public Housing. Regardless of an adverse administrative
15 finding, only Courts may evict. And 24 CFR
16 § 5.861 concerning Section 8 Project Based Housing.
17 Regardless of an adverse administrative finding,
18 only Courts may evict. Each are predetermination
19 procedures. Where as 24 CFR § 982.553(c) concerning
20 Housing Choice Voucher participant based program,
21 there is no eviction or Court predetermination process.
22 Rescinding Plaintiff's Housing Choice Voucher property
23 interest without process deny Equal Protection under
24 the law. U.S. Const. Amend. XIV; Wash Const Art I § 3

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STATEMENT OF JURISDICTION

1	Wash Const Art IV, Sec 1	jurisdiction
2	RCW 2.08.010	original jurisdiction
3	RCW 35.82.070(1)	to be sued
3	RCW 4.12.025	venue
4	28 USC § 1367(d)	tolling
5	Artis v District of Columbia,	
6	No. 16-460, 138 S Ct 594	
6	(2018) tolling. Statute of	
6	Limitations	
7	9-25-2014	termination notice
8	9-29-2014	Hearing Request
9	10-10-2014	Hearing Set
10	10-30-2014	Continued
11	12-04-2014	Post determination
12		Hearing
13	12-17-2014	decision
14	1-16-2015	Petition for Review
14		No. 15-2-00130-6
15	February 2015	Public Records Search
16		publish decision
17	8-25-2015	Office of Fair Housing
17		Complaint
18	3-24-2016	Tort Claim Notice
19	9-14-2016	Federal District Court
20		3:16-cv-05784RBL
21	11-02-2016	Amended Complaint
22	5-08-2018	District Judgment
23	5-31-2019	Ninth 18-35467 Mandate
24	10-21-2019	Certiorari Denied
24		No. 19-5680

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CONTINUEDⁿ
STATEMENT OF JURISDICTION

1	11-23-2020	Notice of Appeal Returned 11-24-2020
2		
3	11-25-2020	Notice of Appeal
4	12-11-2020	Division II Acknowledge Notice of Appeal
5	4-13-2021	Amended Appeal Notice
6	Writ of Review	
7	Statutory Writ of Certiorari	
8	Constitutional Writ of Certiorari	

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CONCLUSION

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WHEREFORE. owing to the Defendants Want of an
1 Administrative Hearing Original Subject Matter Juris-
2 diction or a Local State Agency said jurisdiction,
3 questions that may be raised at any time, Plaintiff
4 request Declaratory Relief. And an Injunction.

5 Moreover, in that Plaintiff has submitted questions
6 respecting constitutions that are offended, that
7 may be raised on appeal, for the first time, Plaintiff
8 also request Declaratory Relief. And an Injunction.

9
10 Praecipe:

11 Relief Sought;

12 Declaratory Judgment that the Vancouver
13 Housing Authority Administrative Orders
14 that rescind Plaintiff's Housing Choice
15 Voucher are VOID AB INITIO and shall not
16 be enforced;

17 An Injunction that enjoin the enforcement
18 of the Defendants' Order that rescind
19 Plaintiff's Housing Choice Voucher and
20 that such H.C.V. be and the same reissued
21 effective for 9-17-2014.

22 Plaintiff be compensated for two bedroom
23 Housing Standard at 120% plus pre-judgment
24 interest, and such further Relief found just.

25 9-22-2021
PLAINTIFF'S OPENING BRIEF

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/s/ Kenneth Taylor Curry
Kenneth Taylor Curry

Kenneth Taylor Curry
1208 N.E. 143rd Ave #3
Vancouver, WA. 98684

FILED
COURT OF APPEALS
DIVISION II

2021 OCT 20 PM 2:01

STATE OF WASHINGTON

CASE NO. 55431-3-II
BY JIT

COURT OF APPEALS DIVISION II

KENNETH TAYLOR CURRY
Plaintiff Appellant

AFFIDAVIT OF SERVICE

v

VANCOUVER HOUSING AUTHORITY
et. Al.

Kenneth Tayloy Curry affirms that he has served on the Defendants an original copy of Plaintiff's Opening Brief, Certificate of Compliance and Affidavit of Service by hand carrying the same to the office of their counsel of record. Or by depositing the said pleadings or documents in U.S. Mail addressed to Defendants counsel with the postage fully prepaid. The foregoing occurring on October 18, 2021.

Kenneth Taylor Curry says that the above statement is true and correct under the penalty of perjury and under the laws of Washington State. RCW 9A.72.085

October 18, 2021

/s/

Kenneth Curry
Kenneth Taylor Curry
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Vancouver, WA 98684
(360) 944-7056

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